EXHIBIT 3: DECLARATION OF JAMES D. NOSEDA REGARDING SATISFIED CLAIMS

4843-3751-4277.2

IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucke
Debtor	:	
	Y	

<u>DECLARATION OF JAMES D. NOSEDA IN SUPPORT OF THE CITY OF DETROIT'S</u> <u>EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS</u>

(Satisfied Claims)

- I, James D. Noseda, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:
- 1. I am the Supervising Assistant Corporation Counsel with the City of Detroit Law Department. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.
- 2. The City's ongoing claims reconciliation process involves the collective effort of a team of employees assembled from personnel specifically familiar with the operations and liabilities of the City. This team works together and in conjunction with City's counsel, the City's financial advisor, and the City's claims agent, to review proofs of claim filed against the City (each, a "Claim" and collectively, the "Claims").

- 3. In connection with the preparation of the Eighteenth Omnibus Objection to Certain Claims (Satisfied Claims) (the "Eighteenth Omnibus Objection"), the City and its financial professionals reviewed the Claims at issue, as described on Exhibit 2 of the Eighteenth Omnibus Objection. I have also personally reviewed the Eighteenth Omnibus Objection and the exhibits attached thereto. Accordingly, I am familiar with the information contained therein.
- 4. The City's Law Department has been settling claims pursuant to this Court's Order, Pursuant to Sections 105 and 502 of the Bankruptcy Code, Approving Alternative Dispute Resolution Procedures to Promote the Liquidation of Certain Prepetition Claims [Dkt. No. 2302] (the "ADR Order") and has been making payments to the claimants based on such settlements. The claims listed on Exhibit 2 of the Eighteenth Omnibus Objection have been settled and paid pursuant to the ADR Order.
- 5. Based on the foregoing review, the City's records indicate that any and all amounts due and owing under the Satisfied Claims have been paid in full, or otherwise settled or released, and, thus, such claims have been satisfied.

[SIGNATURE PAGE FOLLOWS]

1. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 23, 2015

By: <u>/s/ James D. Noseda</u> James D. Noseda

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